



Received

MAR 8 - 2016

Georgia-Pacific Consumer Products LP

March 1, 2016

Office of Air, Waste & Toxics

Wauna Mill
92326 Taylorville Rd.
Clatskanie, OR 97016
(503) 298-2600
(503) 455-3926 fax
www.gp.com

Mr. George F. Davis
Oregon Department of Environmental Quality
Northwest Region
700 NE Multnomah St., Suite #600
Portland, OR 97232-4100

Re: Cluster Rule Excess Emissions and Continuous Monitoring Summary Report

Dear Mr. Davis:

Attached pursuant to Condition 7 of Part 2 of our Title V permit is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period of July 1 through December 31, 2015. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent of total operating time for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent of total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans. As of September 11, 2012, the federal Subpart S rule no longer requires SSM plans [40 CFR 63.6(e)(3)] or semiannual SSM reports [40 CFR 63.10(d)(5)], although excess emissions and continuous monitoring system performance reports (or Summary Reports) are still required [40 CFR 63.10(e)(3)]. This report includes a description of actions taken to minimize emissions and correct malfunctions as required by 40 CFR 455 (g).

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 455 - 3233.

Sincerely,


Steve R. Francoeur
Vice President / Mill Manager

c: Air Operating Permits
US Environmental Protection Agency
Mail Stop OAQ-084
1200 Sixth Avenue
Seattle, WA 98101

File: RR SubA&S Semi - 20

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**Summary Report –
Gaseous and Opacity Excess Emission and
Continuous Monitoring System Performance**

Company Name: Georgia-Pacific Consumer Products LP

Address: 92326 Taylorville Road
Clatskanie, OR 97016

Reporting Period – Begin: July 1, 2015

Reporting Period – End: December 31, 2015

Low Volume High Concentration System

Hazardous Air Pollutant: Methanol (surrogate for total HAP emissions)

Emission Limitation: HAP emissions reduced by introducing the HAP stream with primary air or into the flame zone of a chemical recovery furnace or lime kiln (1% venting allowable)

Monitoring Limitation: LVHC Vents as a 1 minute average

Brief Process Description: LVHC Sources are comprised of two continuous kraft digesters, one set of evaporators and concentrators.

Wood chips or sawdust are fed continuously into a pressure vessel with white liquor, which is a mixture of sodium hydroxide and sodium sulfide. The mixture of wood and white liquor is steamed as it moves through the vessel. Most of the lignin in the wood dissolves, freeing the cellulose fibers, which are used in the paper manufacturing process. Pulp, dissolved lignin, and spent cooking chemicals are discharged from the digester into a blow tank. The vapors from the blow tank go to a condenser to remove the condensable gases. The non-condensable gases are collected and incinerated in either the chemical recovery furnace or the lime kiln.

The spent cooking chemicals or black liquor contain spent organic and inorganic chemicals. The first step in kraft black

liquor recovery is multiple effect evaporation. Using steam as the energy source, water is boiled off to increase the solids content of the liquor. Maintaining a vacuum on the evaporators is accomplished with steam ejectors that exhaust into the evaporator seal tank. The non-condensable gases from the seal tank are collected and incinerated in either the chemical recovery furnace or the lime kiln.

The black liquor is processed further in the concentrators, where steam energy is used to further reduce the water content of the black liquor. The condensate from the concentrators is collected in a tank, where the gases are collected and incinerated in either the chemical recovery furnace or the lime kiln.

Monitor Manufacturer
and Model Number:

5 LVHC Bypass Vent Limit Switches
Stonel QN2SC02SRA
Last Audit Checks: May 2012

4 LVHC Tank Bypass Vents
Groth Valve 1220A-04-555-TOZ
GO Switch 73-13524-A2
Last Audit Checks: May 2012

LVHC Tank Bypass Vents
Groth Valve 1220A-06-555-TOZ
GO Switch 73-13524-A2
Last Audit Checks: May 2012

2 Temperature Probes
Pyco 22-3051-11-9-8
Last Audit / Installation Date: April 2006

Total Operating Time: LVHC Sources = 258,324 Minutes (4,305.4 Hours)

Changes in CMS, processes, controls: No changes in the SSM plan, CMS, processes or controls.

Bleach Plant

Hazardous Air Pollutant: Chlorine (surrogate for chlorinated HAP emissions)

Emission Limitation: 10 ppm at scrubber outlet

Monitoring Limitation: 9.0 pH as a 3 hour block average
275 gpm as a 3 hour block average
Fan On as a 3 hour block average

Brief Process Description: Bleach Plant

Unbleached kraft pulp is brown and contains residual lignin. Bleaching removes the residual lignin and whitens the pulp to commercial levels for the paper manufacturing process. Each chlorine dioxide bleaching stage has a steam mixer, standpipe, chemical mixer, retention tower, pulp washer and seal tank. Bleach plant gases are collected and treated in a fluidized bed scrubber.

Monitor Manufacturer
and Model Number:

Bleach Plant Scrubber pH
OMEGA ORE5460
OMEGA ORCN37 Transmitter
Last Audit Check: June 2012

Bleach Plant Scrubber Total Flow
4" Turbo MG711A
Turbo Intermag Transmitter
Last Audit / Installation Date: May 2000

Bleach Plant Fan On

Total Operating Time: Bleach Plant = 4,191.5 Hours

Changes in CMS, processes, controls: No changes in the SSM plan, CMS, processes or controls.

Hard Pipe Collection and Treatment (Kraft Pulping Condensates)

Hazardous Air Pollutant: Methanol (surrogate for total HAP emissions)

Emission Limitation: Collect 11.1 lbs/ Oven Dried Unbleached Pulp Ton
Treat 92% (10.2 lbs/Oven Dried Unbleached Pulp Ton)

Collection Monitoring Limitation:

- Blow Heat Condensate Tank Level < 100 %
- Blow Heat Condensate Flow > 40 gpm
- Bypass Blow Heat Condensate Flow > 50 gpm
- Evaporator Seal Tank Level < 100 %
- Evaporator Seal Tank Condensate Flow > 50 gpm
- Foul Condensate Tank Level < 100 %
- Foul Condensate Tank Condensate Flow > 500 gpm

Treatment Monitoring Limitation: 18 aerators

Brief Process Description: Pulping Condensate Sources and Treatment are comprised of two continuous kraft digesters, one set of evaporators and a biological treatment system.

Wood chips or sawdust are fed continuously into a pressure vessel with white liquor, which is a mixture of sodium hydroxide and sodium sulfide. The mixture of wood and white liquor is steamed as it moves through the vessel. Most of the lignin in the wood dissolves, freeing the cellulose fibers, which are used in the paper manufacturing process. Pulp, dissolved lignin, and spent cooking chemicals are discharged from the digester into a blow tank. The liquid or condensates from the blow heat condensers are collected in a foul condensate tank.

The spent cooking chemicals or black liquor contain spent organic and inorganic chemicals. The first step in kraft black liquor recovery is multiple effect evaporation. Using steam as the energy source, water is boiled off to increase the solids content of the liquor. The vapors from the evaporators flow to the surface condensers. The liquid or condensates from the surface condensers are collected in a foul condensate tank.

The condensates from a foul condensate tank are pumped to a biological treatment system, which is an activated sludge

aeration basin. At the inlet of the aeration basis, the condensates flow through a dispersion pipe located at the bottom of the basin below the aerators. The condensates rapidly mix with the recycle sludge and effluent from the Mill. Methanol contained in the condensate is rapidly consumed by the micro-organisms in the aeration basin.

Monitor Manufacturer
and Model Number:

Blow Heat Condensate Tank Level
Rosemount
3051CD3A02A1AH2BC
Last Audit / Installation Date: August 2000

Blow Heat Condensate Tank Flow
Turbo
MG 711 / A
Last Audit / Installation Date: August 2000

Blow Heat Condensate Tank Bypass Flow
Turbo
4" MG 711 / A
Last Audit / Installation Date: August 2000

Divert Valve
Jamesbury
ASCO 8317G35
Last Audit / Installation Date: August 2000

Evaporator Seal Tank Level
Rosemount
3051CD3A02A1AN2BC
Last Audit / Installation Date: August 2000

Evaporator Seal Tank Flow
Turbo
2 ' MG 711 / A
Last Audit / Installation Date: August 2000

Foul Condensate Tank Level
Rosemount
3051L3AA0FD21AAE5L4M5
Last Audit / Installation Date: August 2000

Foul Condensate Tank Flow
Turbo
8" MG 711 / A

Last Audit / Installation Date: August 2000

Aerators @ 75 Horsepower each
Number Operating

Total Operating Time: Pulp Condensate Sources = 4,312.0 Hours
Waster Water Treatment System = 4,410.5 Hours

Changes in CMS, processes, controls: No changes in the SSM plan, CMS, processes or controls.

High Volume Low Concentration System (HVLC)

Hazardous Air Pollutant: Methanol (surrogate for total HAP emissions)

Emission Limitation: Stream introduced into chemical recovery furnace flame zone (4% venting allowable)

Monitoring Limitation: HVLC Vents as a 1 minute average

Brief Process Description: HVLC Sources are comprised of two sets of kraft pulp brown stock washing lines. Each line consists of a knoter, two washers and a decker or a third washer and the associated filtrate and foam tanks. It should be noted, the knotters and screening systems are exempt per 63.443(a)(1)(ii)(A)&(B).

Wood chips or sawdust are fed continuously into a pressure vessel with white liquor, which is a mixture of sodium hydroxide and sodium sulfide. The mixture of wood and white liquor is steamed as it moves through the vessel. Most of the lignin in the wood dissolves, freeing the cellulose fibers, which are used in the paper manufacturing process. Pulp is discharged from the digester into a blow tank.

The pulp is washed on vacuum washers, where the high volume of contaminated air containing a low concentration of sulfur compounds, or also known as high volume low concentration (HVLC) gas, is pulled into a collection system for treatment.

Each washer has an associated filtrate tank. The HVLC gas from each filtrate tank flows to the foam tanks. The gases from the foam tanks are used on the brown stock washers.

The collected HVLC gases are conditioned by first cooling the gases to remove moisture and then reheated before introduction into the Chemical Recovery Furnace for incineration.

Monitor Manufacturer
and Model Number:

Chemical Recovery Furnace HVLC Bypass Venting Limit
Switch

Avid XA-041D00

Last Audit: May 2012

Kraft Mill HVLC Bypass Venting Limit Switch

Stonel QZP2SC2R

Last Audit: May 2012

Total Operating Time: HVLC Sources = 255,005 Minutes (4,250.1 Hours)

Changes in CMS, processes, controls: No changes in the SSM plan, CMS, processes or controls.

GEORGIA-PACIFIC CONSUMER PRODUCTS LP
WAUNA MILL
EXCESS EMISSIONS SUMMARY AND SSM REPORT
2nd Semi-Annual 2015
(July 1, 2015 - December 31, 2015)

Low Volume High Concentration Venting - Excess Emissions

| Duration of Excess Emissions in Reporting Period | |
|---|-----------------|
| Category | Minutes |
| A. Startup/Shutdown | 1 |
| B. Control Equipment Problems | 9 |
| C. Process Problems | 6 |
| D. Other Known Causes | 33 |
| E. Other Unknown Causes | 19 |
| Duration of excess emissions (total) | 68 Minutes |
| | 1.1 Hours |
| Source Operating Time (LVHC Sources) | 258,324 Minutes |
| | 4,305.4 Hours |
| Percent Total Excess Emission of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time] | 0.03% |
| Duration of Excess Emissions Less Those Due to SSM Plan Conforming Events (If applied: excluding startup/shutdown, control equipment problems, and process problems) | 0 Minutes |
| | 0.0 Hours |
| Percent Excess Emissions Less Those Due to SSM Plan Conforming Events of Operating Time [If applied: total duration of excess emissions x (100)]/[Total source operating time] | 0.00% |

Low Volume High Concentration Venting - Continuous Monitoring System

| Duration of Continuous Vent Monitoring System Downtime in Reporting Period | |
|---|-----------------|
| Category | Minutes |
| A. Monitoring Equipment Malfunctions | 0 |
| B. Non-Monitoring Equipment Malfunctions | 0 |
| C. QA / QC Calibrations | 0 |
| D. Other Known Causes (mill wide PI computer system) | 1,096 |
| E. Other Unknown Causes | 0 |
| Duration of monitor downtime (total) | 1,096 Minutes |
| Duration of monitor downtime (total) | 18.3 Hours |
| Source Operating Time (LVHC Sources) | 258,324 Minutes |
| Source Operating Time (LVHC Sources) | 4,305.4 Hours |
| Percent Total Monitor Downtime of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time] | 0.42% |
| Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events (If applied: excluding startup/shutdown, control equipment problems, and process problems) | 0 Minutes |
| Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events (If applied: excluding startup/shutdown, control equipment problems, and process problems) | 0.0 Hours |
| Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time [If applied: total duration of excess emissions x (100)]/[Total source operating time] | 0.00% |

**GEORGIA-PACIFIC CONSUMER PRODUCTS LP
WAUNA MILL**

LOW VOLUME HIGH CONCENTRATION SYSTEM

Reporting Period July 1 - December 31, 2015

Excess Emissions / Parameter Monitor Exceedances

| Number | Source | Date | Time | Duration (min) | SSM Plan Followed; "consistent with 40 CFR 63.453" (Y/N) | Nature & Cause | Corrective Action |
|--------|--------------|------------|-------------|----------------|--|----------------------------------|------------------------------------|
| 1 | rf lvhc vent | 8/3/2015 | 1505 | 1 | Y | digester startup | complete startup |
| 2 | lk lvhc vent | 9/29/2015 | 0700 - 0702 | 3 | Y | control equipment switch problem | control equipment switch completed |
| 3 | bhcct | 10/2/2015 | 2216 - 2221 | 6 | Y | process unstable/problem | stabilized process |
| 4 | rf lvhc vent | 10/31/2015 | 0846 - 0918 | 33 | Y | loss of process water | reestablished process water |
| 5 | bhcct | 11/1/2015 | 2134 | 1 | Y | unkown cause | stabilized process |
| 6 | rf lvhc vent | 11/19/2015 | 2023 | 1 | Y | control equipment switch problem | control equipment switch completed |
| 7 | rf lvhc vent | 11/19/2015 | 2025 | 1 | Y | control equipment switch problem | control equipment switch completed |
| 8 | fcct | 12/1/2015 | 0114 - 0120 | 7 | Y | process unstable/problem | stabilized process |
| 9 | fcct | 12/1/2015 | 0131 - 0138 | 8 | Y | process unstable/problem | stabilized process |
| 10 | bswswt | 12/9/2015 | 2147 | 1 | Y | process unstable/problem | stabilized process |
| 11 | fcct | 12/9/2015 | 2148 - 2149 | 2 | Y | process unstable/problem | stabilized process |
| 12 | rf lvhc vent | 12/10/2015 | 0114 - 0116 | 3 | Y | cncg burner tripped offline | started cncg burner |
| 13 | lk lvhc vent | 12/17/2015 | 1052 | 1 | Y | control equipment switch problem | control equipment switch completed |

Total 68

rf lvhc vent = recovery furnace low volume high concentration vent
 lk lvhc vent = recovery furnace low volume high concentration vent
 bhcct = blow heat condensate collection tank
 fcct = foul condensate collection tank
 bswswt = brown stock washer shower water tank

GEORGIA-PACIFIC CONSUMER PRODUCTS LP
WAUNA MILL
EXCESS EMISSIONS SUMMARY AND SSM REPORT
2nd Semi-Annual 2015
(July 1, 2015 - December 31, 2015)

Bleach Plant Scrubber - Excess Emissions

| Duration of Excess Emissions in Reporting Period | |
|--|---------------|
| Category | Hours |
| A. Startup/Shutdown | 0.0 |
| B. Control Equipment Problems | 0.0 |
| C. Process Problems | 0.0 |
| D. Other Known Causes | 0.0 |
| E. Other Unknown Causes | 0.0 |
| Duration of excess emissions (total) | 0.0 Hours |
| Source Operating Time (Bleach Plant) | 4,191.5 Hours |
| Percent Total Excess Emission of Operating Time <small>[Total duration of excess emissions x (100)]/[Total source operating time]</small> | 0.00% |
| Duration of Excess Emissions Less Those Due to SSM Plan Conforming Events <small>(if applied: excluding startup/shutdown, control equipment problems, and process problems)</small> | 0.0 Hours |
| Percent Excess Emissions Less Those Due to SSM Plan Conforming Events of Operating Time <small>(if applied: Total duration of excess emissions x (100))/[Total source operating time]</small> | 0.00% |

Bleach Plant Scrubber - Continuous pH Monitoring System

| Duration of Continuous pH Monitoring System Downtime in Reporting Period | |
|--|---------------|
| Category | Hours |
| A. Monitoring Equipment Malfunctions | 0.0 |
| B. Non-Monitoring Equipment Malfunctions | 0.0 |
| C. QA / QC Calibrations | 0.0 |
| D. Other Known Causes (mill wide PI computer system) | 16.3 |
| E. Other Unknown Causes | 0.0 |
| Duration of monitor downtime (total) | 16.3 Hours |
| Source Operating Time (Bleach Plant) | 4,191.5 Hours |
| Percent Total Monitor Downtime of Operating Time <small>[Total duration of excess emissions x (100)]/[Total source operating time]</small> | 0.39% |
| Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events <small>(if applied: excluding startup/shutdown, control equipment problems, and process problems)</small> | 0.0 Hours |
| Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time <small>(if applied: Total duration of excess emissions x (100))/[Total source operating time]</small> | 0.00% |

Bleach Plant Scrubber - Continuous Scrubbing Liquid Monitoring System

| Duration of Continuous Scrubbing Liquid Monitoring System Downtime in Reporting Period | |
|--|---------------|
| Category | Hours |
| A. Monitoring Equipment Malfunctions | 0.0 |
| B. Non-Monitoring Equipment Malfunctions | 0.0 |
| C. QA / QC Calibrations | 0.0 |
| D. Other Known Causes (mill wide PI computer system) | 0.1 |
| E. Other Unknown Causes | 0.0 |
| Duration of monitor downtime (total) | 0.1 Hours |
| Source Operating Time (Bleach Plant) | 4,191.5 Hours |
| Percent Total Monitor Downtime of Operating Time <small>[Total duration of excess emissions x (100)]/[Total source operating time]</small> | 0.00% |
| Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events <small>(if applied: excluding startup/shutdown, control equipment problems, and process problems)</small> | 0.0 Hours |
| Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time <small>(if applied: Total duration of excess emissions x (100))/[Total source operating time]</small> | 0.00% |

Bleach Plant Scrubber - Continuous Vent Gas Monitoring System

| Duration of Continuous Vent Monitoring System Downtime in Reporting Period | |
|--|---------------|
| Category | Hours |
| A. Monitoring Equipment Malfunctions | 0.0 |
| B. Non-Monitoring Equipment Malfunctions | 0.0 |
| C. QA / QC Calibrations | 0.0 |
| D. Other Known Causes (mill wide PI computer system) | 0.1 |
| E. Other Unknown Causes | 0.0 |
| Duration of monitor downtime (total) | 0.1 Hours |
| Source Operating Time (Bleach Plant) | 4,191.5 Hours |
| Percent Total Monitor Downtime of Operating Time <small>[Total duration of excess emissions x (100)]/[Total source operating time]</small> | 0.00% |
| Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events <small>(if applied: excluding startup/shutdown, control equipment problems, and process problems)</small> | 0.0 Hours |
| Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time <small>(if applied: Total duration of excess emissions x (100))/[Total source operating time]</small> | 0.00% |

**GEORGIA-PACIFIC CONSUMER PRODUCTS LP
WAUNA MILL**

BLEACH PLANT SCRUBBER

Reporting Period **July 1 - December 31, 2015**

Excess Emissions / Parameter Monitor Exceedances

| Number | Source | Date | Time | Duration (hrs) | SSM Plan Followed; "consistent with 40 CFR 63.453" (Y/N) | Nature & Cause | Corrective Action |
|--------|--------|------|------|-------------------|---|----------------|-------------------|
| 0 | na | na | na | na | na | na | na |

GEORGIA-PACIFIC CONSUMER PRODUCTS LP
WAUNA MILL
EXCESS EMISSIONS SUMMARY AND SSM REPORT
2nd Semi-Annual 2015
(July 1, 2015 - December 31, 2015)

Hard Pipe Treatment System (Kraft Pulping Condensates) - Excess Emissions

| Duration of Excess Emissions in Reporting Period | |
|---|---------------|
| Category | Hours |
| A. Startup/Shutdown | 0.0 |
| B. Control Equipment Problems | 0.0 |
| C. Process Problems | 0.0 |
| D. Other Known Causes | 0.0 |
| E. Other Unknown Causes | 0.0 |
| Duration of excess emissions (total) | 0.0 Hours |
| Source Operating Time (waste water treatment system) | 4,410.5 Hours |
| Percent Total Excess Emission of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time] | 0.00% |
| Duration of Excess Emissions Less Those Due to SSM Plan Conforming Events (if applied: excluding startup/shutdown, control equipment problems, and process problems) | 0.0 Hours |
| Percent Excess Emissions Less Those Due to SSM Plan Conforming Events of Operating Time (if applied: Total duration of excess emissions x (100)]/[Total source operating time] | 0.00% |

Hard Pipe Treatment System (Kraft Pulping Condensates) - Continuous Monitoring System

| Duration of Continuous Vent Monitoring System Downtime in Reporting Period | |
|---|---------------|
| Category | Hours |
| A. Monitoring Equipment Malfunctions | 0.0 |
| B. Non-Monitoring Equipment Malfunctions | 0.0 |
| C. QA / QC Calibrations | 0.0 |
| D. Other Known Causes (mill wide PI computer system) | 0.0 |
| E. Other Unknown Causes | 0.0 |
| Duration of monitor downtime (total) | 0.0 Hours |
| Source Operating Time (waste water treatment system) | 4,410.5 Hours |
| Percent Total Monitor Downtime of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time] | 0.00% |
| Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events (if applied: excluding startup/shutdown, control equipment problems, and process problems) | 0.0 Hours |
| Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time (if applied: Total duration of excess emissions x (100)]/[Total source operating time] | 0.00% |

Hard Pipe Collection System (Kraft Pulping Condensates) - Excess Emissions

| Duration of Excess Emissions in Reporting Period | |
|---|---------------|
| Category | Hours |
| A. Startup/Shutdown | 0.0 |
| B. Control Equipment Problems-Malfunction | 0.0 |
| C. Process Problems-Malfunction | 0.0 |
| D. Other Known Causes | 0.0 |
| E. Other Unknown Causes | 0.0 |
| Duration of excess emissions (total) | 0.0 Hours |
| Source Operating Time (pulping condensate sources) | 4,312.0 Hours |
| Percent Total Excess Emission of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time] | 0.00% |
| Duration of Excess Emissions Less Those Due to SSM Plan Conforming Events (if applied: excluding startup/shutdown, control equipment problems, and process problems) | 0.0 Hours |
| Percent Excess Emissions Less Those Due to SSM Plan Conforming Events of Operating Time (if applied: Total duration of excess emissions x (100)]/[Total source operating time] | 0.00% |

Hard Pipe Collection System (Kraft Pulping Condensates) - Continuous Monitoring System

| Duration of Continuous Vent Monitoring System Downtime in Reporting Period | |
|---|---------------|
| Category | Hours |
| A. Monitoring Equipment Malfunctions | 0.0 |
| B. Non-Monitoring Equipment Malfunctions | 0.0 |
| C. QA / QC Calibrations | 0.0 |
| D. Other Known Causes (mill wide PI computer system) | 0.0 |
| E. Other Unknown Causes | 0.0 |
| Duration of monitor downtime (total) | 0.0 Hours |
| Source Operating Time (pulping condensate sources) | 4,312.0 Hours |
| Percent Total Monitor Downtime of Operating Time [Total duration of excess emissions x (100)]/[Total source operating time] | 0.00% |
| Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events (if applied: excluding startup/shutdown, control equipment problems, and process problems) | 0.0 Hours |
| Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time (if applied: Total duration of excess emissions x (100)]/[Total source operating time] | 0.00% |

**GEORGIA-PACIFIC CONSUMER PRODUCTS LP
WAUNA MILL**

HARD PIPE TREATMENT SYSTEM (Kraft Pulping Condensates)

Reporting Period July 1 - December 31, 2015

Excess Emissions / Parameter Monitor Exceedances

| Number | Source | Date | Time | Duration (hrs) | SSM Plan Followed; "consistent with 40 CFR 63.453" (Y/N) | Nature & Cause | Corrective Action |
|--------|--------|------|------|-------------------|--|----------------|-------------------|
| 0 | na | na | na | na | na | na | na |

GEORGIA-PACIFIC CONSUMER PRODUCTS LP
WAUNA MILL
EXCESS EMISSIONS SUMMARY AND SSM REPORT
2nd Semi-Annual 2015
(July 1, 2015 - December 31, 2015)

High Volume Low Concentration Venting - Excess Emissions

| Duration of Excess Emissions in Reporting Period | |
|--|----------------------------------|
| Category | Minutes |
| A. Startup/Shutdown | 0 |
| B. Control Equipment Problems | 0 |
| C. Process Problems | 34 |
| D. Other Known Causes | 0 |
| E. Other Unknown Causes | 0 |
| Duration of excess emissions | 34 Minutes 0.6 Hours |
| Source Operating Time (HVLC Sources) | 255,005 Minutes 4,250.1 Hours |
| Percent Total Excess Emission of Operating Time <small>[Total duration of excess emissions x (100)]/[Total source operating time]</small> | 0.01% |
| Duration of Excess Emissions Less Those Due to SSM Plan Conforming Events <small>(if applied: excluding startup/shutdown, control equipment problems, and process problems)</small> | 0 Minutes 0.0 Hours |
| Percent Excess Emissions Less Those Due to SSM Plan Conforming Events of Operating Time <small>[if applied: Total duration of excess emissions x (100)]/[Total source operating time]</small> | 0.00% |

High Volume Low Concentration Venting - Continuous Monitoring System

| Duration of Continuous Vent Monitoring System Downtime in Reporting Period | |
|--|----------------------------------|
| Category | Minutes |
| A. Monitoring Equipment Malfunctions | 0 |
| B. Non-Monitoring Equipment Malfunctions | 0 |
| C. QA / QC Calibrations | 0 |
| D. Other Known Causes (mill wide PI computer system) | 1,045 |
| E. Other Unknown Causes | 0 |
| Duration of monitor downtime (total) | 1,045 Minutes 17.4 Hours |
| Source Operating Time (HVLC Sources) | 255,005 Minutes 4,250.1 Hours |
| Percent Total Monitor Downtime of Operating Time <small>[Total duration of excess emissions x (100)]/[Total source operating time]</small> | 0.41% |
| Duration of Monitor Downtime Less Those Due to SSM Plan Conforming Events <small>(if applied: excluding startup/shutdown, control equipment problems, and process problems)</small> | 0 Minutes 0.0 Hours |
| Percent Monitor Downtime Less Those Due to SSM Plan Conforming Events of Operating Time <small>[if applied: Total duration of excess emissions x (100)]/[Total source operating time]</small> | 0.00% |

**GEORGIA-PACIFIC CONSUMER PRODUCTS LP
WAUNA MILL**

HIGH VOLUME HIGH CONCENTRATION SYSTEM

Reporting Period July 1 - December 31, 2015

Excess Emissions / Parameter Monitor Exceedances

| Number | Source | Date | Time | Duration (min) | SSM Plan Followed; "consistent with 40 CFR 63.453" (Y/N) | Nature & Cause | Corrective Action |
|--------|-----------|------------|-------------|-------------------|--|--|---------------------|
| 1 | hvlc vent | 8/13/2015 | 1214 - 1241 | 28 | Y | HVLC system tripped offline, high gas temp after cooler | stabilized gas temp |
| 2 | hvlc vent | 10/31/2015 | 0829 - 0834 | 6 | Y | HVLC system tripped offline, high gas temp after cooler | stabilized gas temp |

Total 34

hvlc vent = high volume low concentration vent